

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

ADAMS KEEGAN, INC.,
Plaintiff,

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) **Civil Action No. 2:16-cv-2152-SHM-cgc**
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v.

PROTIVITI, INC.,
Defendant.

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**DEFENDANT PROTIVITI, INC.'S UNOPPOSED MOTION
TO ENLARGE TIME TO RESPOND TO THE COMPLAINT**

Defendant Protiviti, Inc. ("Protiviti") respectfully moves the Court to enter the accompanying proposed Order, enlarging the original time period for responding to the Summons and Complaint in this action by 30 days, up to and including May 6, 2016. Protiviti has conferred with Plaintiff Adams Keegan, Inc. ("Adams Keegan") regarding this extension, and Adams Keegan does not oppose.

Defendant offers the following facts in support of this motion:

1. The original Summons and Complaint were served on Protiviti on March 16, 2016 prescribing a response period of twenty-one days, which will expire on April 6, 2016.
2. No prior request for extension of this period has been made, and Adams Keegan does not oppose it.
3. This relief is authorized by Fed. R. Civ. P. 6(b).
4. Protiviti's counsel is in the process of diligently investigating and preparing a proper response to the Complaint.

WHEREFORE, for good cause shown, Protiviti requests that the Court enter an Order extending Protiviti's deadline for filing its responsive pleading to Adams Keegan's Complaint to May 6, 2016. A proposed Order is filed contemporaneously with this Motion for the Court's convenience.

CERTIFICATE OF CONSULTATION

Defendant's counsel, Brian Finch, certifies that he conferred with Plaintiff's counsel, Adam Baldrige, pursuant to Court Local Rule 7 regarding the above stated issues. Mr. Baldrige stated that he does not oppose the relief sought herein.

Dated: April 5, 2016.

Respectfully submitted,

s/ Ashley E. Cowgill

Ashley E. Cowgill (TN Bar No. 033042)

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CERTIFICATE OF SERVICE

The foregoing document was filed via the Court's CM/ECF system, automatically effecting service on counsel of record for all other parties to this action, on this 5th day of April, 2016.

s/ Ashley E. Cowgill